

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Civil Case No. 4:23-CV-00009
)	
\$115,800.00 IN U.S. CURRENCY)	
FUNDS SEIZED FROM SOUTH)	
GEORGIA BANK ACCOUNT)	
ENDING IN 0378, ET AL.,)	
)	
Defendants.)	

NOTICE OF FORFEITURE

TO:

House of Prayer Christian Churches of America, Inc.
2540 Airport Road
Hinesville, GA. 31313

First Citizens Bank and Trust
Attn: Sharon Crabbe
P.O. Box 27131
Raleigh, NC. 27611

Brian Thomas Rafferty
Attorney at Law
1170 Peachtree Street,
Suite 2400
Atlanta, GA. 30309

Marcus Labat
812 Forest Street
Hinesville, GA. 31313

Dennis Nostrant
P.O. Box 922
Walthourville, GA. 31333

Dennis Nostrant
2540 Airport Road
Hinesville, GA. 31313

U.S. Department of Veterans Affairs
Debt Management Center 189
Attn: Julie Lawrence
P.O. Box 11930
St. Paul, MN. 55111

Steven Sadow
Attorney at Law
260 Peachtree Street, N.W.
Suite 2700
Atlanta, GA 30303

James B. Benton
412 Willow Oak Lane
Hinesville, GA. 31313

Jeffrey Derby
402 Willow Oak Lane
Hinesville, GA. 31313

Jeffrey Derby
812 Forest Street
Hinesville, GA. 31313

Anthony S. Oloans
401 Club Drive
Hinesville, GA. 31313

Gerard Robertson
223 Slayton Circle
Hinesville, GA. 31313

South Georgia Bank
Attn: Jay W. Hales
401 S. Veterans Blvd.
Glennville, GA. 30427

Marjorie Robertson Denis
3816 Honors Way
Martinez, GA. 30907

Marjorie Robertson Denis
428 Willow Oak Lane
Hinesville, GA. 31313

Phebe Ruth Denis
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3151 Maple Drive, NE
Atlanta, GA. 30305

Rony Denis
3816 Honors Way
Martinez, GA. 30907

Rony Denis
428 Willow Oak Lane
Hinesville, GA. 31313

Christopher Ryan Barnes
1407 E. 31st Street
Tacoma, WA. 98404

The enclosed Complaint is sent pursuant to Rule G(4)(b)(i) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions (“Supplemental Rules”).

1. **DATE OF NOTICE:** January 24, 2023
2. **FORFEITURE COMPLAINT:** On January 6, 2023, the United States of America filed a civil complaint (the “Complaint”) seeking forfeiture, pursuant to 18 U.S.C. § 981 (a)(1)(A) and (a)(1)(C), of the following defendant property:
 - a. \$115,800.00 in U.S. Currency Funds from South Georgia Bank Account ending in 0378 (“**Account 1**”);
 - b. \$21,263.24 in U.S. Currency Funds from First Citizens Bank and Trust Account ending in 2757 (“**Account 2**”);
 - c. \$6,715.85 in U.S. Currency Funds from First Citizens Bank and Trust Account ending in 2888 (“**Account 3**”);
 - d. \$3,168.33 in U.S. Currency Funds from First Citizens Bank and Trust Account ending in 2837 (“**Account 4**”);
 - e. \$578.84 in U.S. Currency Funds from First Citizens Bank and Trust Account ending in 2896 (“**Account 5**”); and
 - f. \$2,665.53 in U.S. Currency Funds from South Georgia Bank Account ending in 0360 (“**Account 6**”).
3. **FILING OF A VERIFIED CLAIM:** Pursuant to Supplemental Rule G(5)(a)(ii), in order to avoid forfeiture of the defendant property, any person who asserts an interest in the defendant property **must** file a verified claim within **thirty-five (35)** days of the date of this notice, but **no later than February 28, 2023**.
4. **CONTENTS OF VERIFIED CLAIM:** Pursuant to Rule G(5)(a), the claim must (A) identify the specific property claimed; (B) identify the claimant and state the claimant’s interest in the property; and (C) be signed by the claimant under penalty of perjury.
5. **FILING OF AN ANSWER:** If you file a verified claim, you **must** then file an answer to the Complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure within **twenty-one (21)** days after filing the verified claim.

6. **FILING WITH THE COURT / SERVICE ON THE UNITED STATES:** The verified claim and answer must be filed with the Office of the Clerk, United States District Court for the Southern District of Georgia to the attention of Case No. 4:23-CV-00009. The Office of the Clerk is physically located at the United States Courthouse, 8 Southern Oaks Court, Savannah, Georgia 31405 with a mailing address of P.O. Box 8286, Savannah, Georgia 31412-8286. A copy of the claim and any answer or motion must be sent to Assistant United States Attorney J. Bishop Ravenel, United States Attorney's Office, Southern District of Georgia, P.O. Box 8970, Savannah, Georgia 31412-8970.

Failure to follow the requirements set forth above may result in judgment by default for the relief demanded in the Complaint. You may wish to seek legal advice to protect your interests.

This 24th day of January, 2023.

DAVID H. ESTES
UNITED STATES ATTORNEY

/s/ J. Bishop Ravenel

J. Bishop Ravenel
Assistant United States Attorney
Virginia Bar No. 70250
Post Office Box 8970
Savannah, Georgia 31412
Telephone: (912) 652-4422
Email: bishop.ravenel@usdoj.gov

Enclosures:

Complaint
Warrant for Arrest of Personal Property in Rem
Copy of Rule 12 of Federal Rules of Civil Procedure and Supplemental Rule G

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION**

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)	
Defendants.)	

CERTIFICATE OF SERVICE OF NOTICE OF FORFEITURE

This is to certify that I have on this day served the following individuals via
Certified Mail, Return Receipt Requested, at the following addresses:

House of Prayer Christian Churches of America, Inc.
2540 Airport Road
Hinesville, GA. 31313

First Citizens Bank and Trust
Attn: Sharon Crabbe
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Raleigh, NC. 27611

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1407 E. 31st Street
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This 24th day of January, 2023.

DAVID H. ESTES
UNITED STATES ATTORNEY

/s/ J. Bishop Ravenel

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Assistant United States Attorney
Virginia Bar No. 70250
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Savannah, Georgia 31412
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Email: bishop.ravenel@usdoj.gov